

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

HILLSIDE PLASTICS, INC.,

Plaintiff,

v.

DOMINION & GRIMM USA, INC., and  
DOMINION & GRIMM, INC.

Defendant.

Civil Action No. 17-30037

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**DEFENDANTS' MOTION TO STAY DISCOVERY**

Defendants Dominion & Grimm, Inc. and Dominion & Grimm USA, Inc. (collectively, “D&G”), through their undersigned counsel, request that the Court stay all discovery in this action pending resolution of D&G’s Motion for Judgment on the Pleadings pursuant to Fed. R. Civ. P. 12(c), filed concurrently. For the reasons set forth in the accompanying Memorandum of Reasons, D&G respectfully requests that this Court grant the present Motion to Stay Discovery.

**LOCAL RULE 7.1(a)(2) CERTIFICATION**

The undersigned counsel certifies that they conferred with counsel for Plaintiff and the Parties were unable to resolve or narrow the issues raised by this Motion to Stay, which Hillside opposes.

Dated: November 7, 2017

Respectfully submitted,

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*Counsel for Defendants Dominion & Grimm, Inc  
and Dominion & Grimm USA, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated a non-registered participants on the date of electronic filing.

/s/ Matthew C. Hurley  
Matthew C. Hurley